REMARKS

By this amendment, claims 4, 5, 10, 17 and 18 are canceled (claim 37 was previously canceled). Claims 1, 11, 22 and 31-35 have been amended. Claims 1-3, 6-9, 11-16 and 19-36 remain in the application. Support for the amendments can be found the specification and drawings. No new matter has been added. This application has been carefully considered in connection with the Examiner's Action. Reconsideration, and allowance of the application, as amended, is respectfully requested.

Rejection under 35 U.S.C. §103

Claim 1:

Claim 1 recites a method for providing content identification within a media data stream for distribution from a media content data source device comprising:

receiving the data stream of media content at the media content data source device; and

inserting content identification data into frames of the media data stream, in conjunction with each data frame for which a corresponding content identification data relates, at regular intervals within the media data stream to be distributed, wherein the content identification data includes a tamper resistant identifier that (a)(i) is based upon a rapidly changing property extracted from a given data frame of the media data stream that is difficult to alter and (a)(ii) is inserted into the media data stream in conjunction with the corresponding given data frame by reference to the rapidly changing property from which property data was extracted, further wherein the rapidly changing property of the media data stream includes a property which changes with each frame of the media data stream, the content identification data further comprising a continuity count within the identifier, wherein the continuity count comprises a data field that increments in a predictable manner each time the identifier is inserted into the media data stream to enable a detection of unauthorized editing by detecting any discontinuity in an

embedded continuity count, wherein inserting content identification data further comprises:

extracting data relating to a predetermined property of the media data stream;

combining the extracted data with content identification data by forming a hash code from (b)(i) the extracted data and (b)(ii) the content identification data;

applying a digital signature to the hash code of combined data that includes applying both (c)(i) a digital signature of the originator of the media data stream and (c)(ii) a digital signature of a corresponding certification authority; and

inserting the combined data and digital signature as secured content identification data into the data stream.

Support for the amendments to claim 1 (as well as for claims 11, 22, 31, 34 and 35) can be found in the specification at least on page 3, lines 12-19; page 9, lines 15-32; page 10, lines 1-3; page 11, lines 27-32; and page 12, lines 1-11.

As now presented, claim 1 now more clearly articulates the novel and non-obvious method for providing content identification within a media data stream for distribution from a media content data source device. As discussed in the specification at least on page 2, lines 23-31, the method advantageously provides secure content identification and authentication on media data streams that may not be bit-for-bit identical. In addition, the method provides secure identification and authentication on media data streams that may not be co-extensive in length such that a content tag may be missing. Furthermore, the method advantageously provides for reliably enabling comparison of two differing media data streams to establish whether they relate to the same secured media content.

In addition, as discussed in the specification at least on page 6, lines 18-26, the phrase "content identification data" refers to an identity of a content provider, the name or title of the media, and/or information relating to the subject matter of the media (e.g., whether the media content is a pay-per-view movie or a free-to-view advertisement). The identifier can also be any item of identification data originated by the media content provider, for example, indicating some nature of the media content.

Furthermore, as discussed in the specification at least on page 7, lines 7-10, 14-16, and 26-30, the tamper resistant identifier is "protected in such a manner that it cannot easily be inserted into a data stream … and such that [the] identifier can be verified as authentic." The tamper resistance of the identifier uses a "rapidly changing property of the media data stream that is difficult to alter." The rapidly changing property is used to generate or extract data that can be combined with the identifier to make it difficult to copy and insert [non-authenticate copied] identifiers.

Moreover, as discussed in the specification at least on page 9, lines 15-32 and page 10, lines 1-3, the embodiments protect against a receiver device being provided with a false public key. That is, the embodiments of the present disclosure protect against the identifier being corrupted or altered by a fraudulent party and the distributing of a false key to a receiver device. A certificate tree is used in the tamper resistant content identifier to detect who created the identifier. The certificate embedded in the broadcast media data stream is checked against the certificate of the body that created the identifier. Accordingly, a receiving device can detect the presence of a genuine signature on the data.

Claims 1-3, 6-9, 31 and 36 were rejected under 35 U.S.C. §103(a) as being unpatentable over **Deguillaume** et al., (US Pub No 2003/0070075, hereinafter referred to as "**Deguillaume**") in view of **Penk** et al. (US Pub No 2003/0074670, hereinafter referred to as "**Penk**"), and further in view of **Yoshida** (Japanese Pub. No. JP 200165248, hereinafter referred to as "**Yoshida**"). With respect to claim 1, as amended

herein, Applicant respectfully traverses this rejection on the grounds that these references are defective in establishing a prima facie case of obviousness.

As the PTO recognizes in MPEP § 2142:

> *... The examiner bears the initial burden of factually supporting any prima facie conclusion of obviousness. If the examiner does not produce a prima facie case, the applicant is under no obligation to submit evidence of nonobviousness...*

It is submitted that, in the present case, the examiner has not factually supported a prima facie case of obviousness for the following reasons.

1. Even When Combined, the References Do Not Teach the Claimed Subject Matter

The **Deguillaume**, **Penk** and **Yoshida** references cannot be applied to reject claim 1 under 35 U.S.C. § 103 which provides that:

> *A patent may not be obtained ... if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which the subject matter pertains* ... (Emphasis added)

Thus, when evaluating a claim for determining obviousness, all limitations of the claim must be evaluated. However, since neither **Deguillaume**, **Penk** nor **Yoshida** teaches a method for providing content identification within a media data stream for distribution that includes "*applying* … to the hash code of combined data … *both* (c)(i) a *digital signature* of the *originator of the media data stream* and (c)(ii) a *digital signature* of a corresponding *certification authority* …" [emphasis added] as is now claimed in claim 1, it is impossible to render the subject matter of claim 1 as a whole obvious, and the explicit terms of the statute cannot be met.

In contrast, **Deguillaume** teaches a secure hybrid watermarking method joining a robust and a fragile watermark that combines copyright protection, authentication and tamperproofing. In the method of **Deguillaume**, the fragile information is inserted in a way which preserves the resistance and reliability of the robust part. (See Deguillaume

Abstract). However, **Deguillaume** does not teach or suggest "*applying* … to the hash code of combined data … *both* (c)(i) a *digital signature* of the *originator of the media data stream* and (c)(ii) a *digital signature* of a corresponding *certification authority* …" as is specifically recited in claim 1 of the present application.

In further contrast, while **Penk** teaches **"**providing *dynamic* network information to *devices* in a *network*" and a device that "uses the received network information to *monitor* the *network* and to *determine network conditions*" and wherein "content received from the content providers is in the form of a *transport* stream" [emphasis added] (see Penk Abstract, and at paragraph [0041]), **Penk** does not teach or suggest "*applying* … to the hash code of combined data … *both* (c)(i) a *digital signature* of the *originator of the media data stream* and (c)(ii) a *digital signature* of a corresponding *certification authority* …" as is specifically recited in claim 1 of the present application.

In still further contrast, while **Yoshida** teaches an electronic watermark embedding method that embeds a frame number to each frame as an electronic watermark (see Yoshida Abstract), **Yoshida** does not teach or suggest "*applying* … to the hash code of combined data … *both* (c)(i) a *digital signature* of the *originator of the media data stream* and (c)(ii) a *digital signature* of a corresponding *certification authority* …" as is specifically recited in claim 1 of the present application.

Thus, for this reason, the examiner's burden of factually supporting a *prima facie* case of obviousness has clearly not been met, and the rejection under 35 U.S.C. §103 should be withdrawn.

2. The Combination of References is Improper

Assuming, arguendo, that the above argument for non-obviousness does not apply (which is clearly not the case based on the above), there is still another compelling reason why the **Deguillaume**, **Penk** and **Yoshida** references cannot be applied to reject claim 1 under 35 U.S.C. § 103.

§ 2142 of the MPEP also provides:

> *...the examiner must step backward in time and into the shoes worn by the hypothetical 'person of ordinary skill in the art' when the invention was unknown and just before it was made.....The examiner must put aside knowledge of the applicant's disclosure, refrain from using hindsight, and consider the subject matter claimed 'as a whole'.*

Here, neither **Deguillaume**, **Penk** nor **Yoshida** teaches, or even suggests, the desirability of the combination since none teaches the "*applying* … to the hash code of combined data … *both* (c)(i) a *digital signature* of the *originator of the media data stream* and (c)(ii) a *digital signature* of a corresponding *certification authority* …" as specified above and as claimed in claim 1.

Thus, it is clear that neither reference provides any incentive or motivation supporting the desirability of the combination. Therefore, there is simply no basis in the art for combining the references to support a 35 U.S.C. § 103 rejection.

In this context, the MPEP further provides at § 2143.01:

> *The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.*

In the above context, the courts have repeatedly held that obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching, suggestion or incentive supporting the combination. In the present case it is clear that the combination as suggested by the office action arises solely from hindsight based on the invention without any showing, suggestion, incentive or motivation in either reference for the combination as applied to claim 1. Therefore, for this reason, the examiner's burden of factually supporting a *prima facie* case of obviousness has clearly not been met, and the rejection under 35 U.S.C. §103 should be withdrawn.

Accordingly, claim 1 is allowable and an early formal notice thereof is requested. Claims 2-3, 6-9 and 36 depend from and further limit independent claim 1 and therefore are allowable as well. The 35 U.S.C. §103(a) rejection thereof has now been overcome.

Withdrawal of the rejection is requested.

Claim 31 has been amended in a manner similar to the amendments to claim 1. Accordingly, for similar reasons as stated with respect to overcoming the rejection of claim 1, claim 31 is believed allowable and an early formal notice thereof is requested. The 35 U.S.C. §103(a) rejection thereof has now been overcome. Withdrawal of the rejection is respectfully requested.

Claims 4-5 and 32-33 were rejected under 35 U.S.C. §103(a) as being unpatentable over **Deguillaume**, **Penk** and **Yoshida** as applied to claims 1 and 31, and further in view of **Miettinen** et al. (US Pub No 2002/0138729, hereafter referred to as "**Miettinen**"). With respect to claims 4-5, the same have been canceled herein, thus rendering the rejection thereof now moot. With respect to claims 32-33, applicant respectfully traverses this rejection for at least the following reasons. Claims 32-33 depend from and further limit allowable independent claim 31 and therefore are allowable as well. Withdrawal of the rejection is requested.

Claim 10 was rejected under 35 U.S.C. §103(a) as being unpatentable over **Deguillaume**, **Penk**, **Yoshida** and **Miettinen** as applied to claim 5, and further in view of **Everett** (US Patent No 6,328,217, hereafter referred to as "**Everett**"). Claim 10 has been canceled herein, thus rendering the rejection thereof now moot.

Claim 11:

Claim 11 recites a method of transcoding a media data stream for distribution from a transcoder device, the method comprising:

receiving a data stream of media content from a media content data source device, the data stream of media content including embedded, secured content identification data in frames of the media data stream, in conjunction with each

data frame for which a corresponding content identification data relates, at regular intervals within the media data stream, in which the secured content identification data incorporates data relating to a predetermined property of the media data stream and that corresponds to a tamper resistant identifier that (a)(i) is based upon a rapidly changing property extracted from a given data frame of the media data stream that is difficult to alter and (a)(ii) is inserted into the media data stream in conjunction with the corresponding given data frame by reference to the rapidly changing property from which property data was extracted, further wherein the rapidly changing property of the media data stream includes a property which changes with each frame of the media data stream, the content identification data further including a continuity count within the identifier, wherein the continuity count comprises a data field that increments in a predictable manner each time the identifier is inserted into the media data stream to enable a detection of unauthorized editing by detecting any discontinuity in an embedded continuity count, wherein inserted content identification data further comprises extracted data relating to a predetermined property of the media data stream, the extracted data being combined with content identification data by forming a hash code from (b)(i) the extracted data and (b)(ii) the content identification data, a digital signature being applied to the hash code of combined data that includes applying both (c)(i) a digital signature of the originator of the media data stream and (c)(ii) a digital signature of a corresponding certification authority, and the combined data and digital signature being embedded as the secured content identification data in the data stream;

transcoding the media content of the data stream into a new format;

extracting data relating to a predetermined property of the media data stream in its new format;

extracting content identification data from the secured content identification data;

combining the extracted data with the extracted content identification data by forming a hash code from (d)(i) the extracted data and (d)(ii) the content identification data;

applying a digital signature to the hash code of combined data that includes applying a digital signature of the transcoding device and making available a corresponding public key of the transcoding device that is digitally signed by the originator of the content identification data; and

inserting the combined data and digital signature as re-secured content identification data into the data stream corresponding to a transcoded data stream output by the transcoder device.

Support for the amendments to claim 11 (as well as for claim 34) can be found in the specification at least on page 3, lines 12-19; page 9, lines 15-32; page 10, lines 1-3; page 11, lines 27-32; and page 12, lines 1-11.

Claims 11-16 and 34 were rejected under 35 U.S.C. §103(a) as being unpatentable over **Chang** et al. (US Patent No 6,963,972, hereinafter "**Chang**") in view of **Deguillaume**, in view of **Yoshida**. and further in view of **Miettinen**. With respect to claim 11, as amended herein, Applicant respectfully traverses this rejection on the grounds that these references are defective in establishing a prima facie case of obviousness.

As the PTO recognizes in MPEP § 2142:

> *... The examiner bears the initial burden of factually supporting any prima facie conclusion of obviousness. If the examiner does not produce a prima facie case, the applicant is under no obligation to submit evidence of nonobviousness...*

It is submitted that, in the present case, the examiner has not factually supported a prima facie case of obviousness for the following reasons.

3. Even When Combined, the References Do Not Teach the Claimed Subject Matter

The **Chang**, **Deguillaume**, **Yoshida**, and **Miettinen** references cannot be applied to reject claim 11 under 35 U.S.C. § 103 which provides that:

> *A patent may not be obtained ... if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which the subject matter pertains* ... (Emphasis added)

Thus, when evaluating a claim for determining obviousness, all limitations of the claim must be evaluated. However, since neither **Chang**, **Deguillaume**, **Yoshida**, nor **Miettinen** teaches a method that includes "*applying* … to the hash code of combined data … *both* (c)(i) a *digital signature* of the *originator of the media data stream* and (c)(ii) a *digital signature* of a corresponding *certification authority* …" [emphasis added] as is now claimed in claim 11, it is impossible to render the subject matter of claim 11 as a whole obvious, and the explicit terms of the statute cannot be met.

Thus, for this reason, the examiner's burden of factually supporting a *prima facie* case of obviousness has clearly not been met, and the rejection under 35 U.S.C. §103 should be withdrawn.

4. The Combination of References is Improper

Assuming, arguendo, that the above argument for non-obviousness does not apply (which is clearly not the case based on the above), there is still another compelling reason why the **Chang**, **Deguillaume**, **Yoshida**, and **Miettinen** references cannot be applied to reject claim 11 under 35 U.S.C. §103.

§ 2142 of the MPEP also provides:

> *...the examiner must step backward in time and into the shoes worn by the hypothetical 'person of ordinary skill in the art' when the invention was unknown and just before it was made.....The examiner must put aside knowledge of the applicant's disclosure, refrain from using hindsight, and consider the subject matter claimed 'as a whole'.*

Here, neither **Chang**, **Deguillaume**, **Yoshida**, nor **Miettinen** teaches, or even suggests, the desirability of the combination since none teaches the specific method that includes "*applying* … to the hash code of combined data … *both* (c)(i) a *digital signature* of the *originator of the media data stream* and (c)(ii) a *digital signature* of a corresponding *certification authority* …" [emphasis added] as specified above and as claimed in claim 11.

Thus, it is clear that neither reference provides any incentive or motivation supporting the desirability of the combination. Therefore, there is simply no basis in the art for combining the references to support a 35 U.S.C. §103 rejection.

In this context, the MPEP further provides at § 2143.01:

> *The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination*.

In the above context, the courts have repeatedly held that obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching, suggestion or incentive supporting the combination.

In the present case it is clear that the combination as suggested by the office action arises solely from hindsight based on the invention without any showing, suggestion, incentive or motivation in either reference for the combination as applied to claim 11. Therefore, for this reason, the examiner's burden of factually supporting a *prima facie* case of obviousness has clearly not been met, and the rejection under 35 U.S.C. §103 should be withdrawn.

Accordingly, claim 11 is allowable and an early formal notice thereof is requested. Claims 12-16 depend from and further limit allowable independent claim 11 and therefore are allowable as well. Withdrawal of the rejection is requested.

Claim 34 has been amended in a manner similar to the amendments to claim 11. Accordingly, for similar reasons as stated with respect to overcoming the rejection of claim 11, claim 34 is believed allowable and an early formal notice thereof is requested.

The 35 U.S.C. § 103(a) rejection thereof has now been overcome. Withdrawal of the rejection is respectfully requested.

Claim 17 was rejected under 35 U.S.C. §103(a) as being unpatentable over **Chang**, **Deguillaume**, **Yoshida** and **Miettinen** as applied to claim 11, and further in view of **Everett**. By this amendment, claim 17 has been canceled, thus rendering the rejection thereof now moot.

Claim 18 was rejected under 35 U.S.C. §103(a) as being unpatentable over **Chang**, **Deguillaume**, **Yoshida**, **Miettinen** and **Everett** as applied to claim 17, and further in view of **Reeds** et al. (US Patent No 5,153,919, hereinafter "**Reeds**"). By this amendment, claim 17 has been canceled, thus rendering the rejection thereof now moot.

Claims 19-21 were rejected under 35 U.S.C. §103(a) as being unpatentable over **Chang**, **Deguillaume**, **Yoshida**, **Miettinen** as applied to claim 11 and further in view of **McCormack** et al. (US Pub No 2004/0143836, hereinafter "**McCormack**"). Applicant traverses this rejection for at least the following reason. Claims 19-21 depend from and further limit allowable independent claim 11 and therefore are allowable as well. Withdrawal of the rejection is requested.

Claim 22:

Claim 22 recites method of verifying the integrity of secured content identification data embedded in a media data stream with a receiver device, comprising:

receiving a data stream of media content by the receiver device, the data stream of media content including embedded, secured content identification data in frames of the media data stream, in conjunction with each data frame for which

a corresponding content identification data relates, at regular intervals within the media data stream, in which the secured content identification data incorporates data relating to a predetermined property of the media data stream and that corresponds to a tamper resistant identifier that (a)(i) is based upon a rapidly changing property extracted from a given data frame of the media data stream that is difficult to alter and (a)(ii) is inserted into the media data stream in conjunction with the corresponding given data frame by reference to the rapidly changing property from which property data was extracted, further wherein the rapidly changing property of the media data stream includes a property which changes with each frame of the media data stream, the content identification data further including a continuity count within the identifier, wherein the continuity count comprises a data field that increments in a predictable manner each time the identifier is inserted into the media data stream to enable a detection of unauthorized editing by detecting any discontinuity in an embedded continuity count, wherein inserted content identification data further comprises extracted data relating to a predetermined property of the media data stream, the extracted data being combined with content identification data by forming a hash code from (b)(i) the extracted data and (b)(ii) the content identification data, a digital signature being applied to the hash code of combined data that includes applying both (c)(i) a digital signature of the originator of the media data stream and (c)(ii) a digital signature of a corresponding certification authority, and the combined data and digital signature being embedded as the secured content identification data in the data stream;

extracting first data relating to a predetermined property of the media data stream;

extracting content identification data from the secured content identification data;

extracting second data relating to the predetermined property from the

secured content identification data; and

comparing the first data and the second data to verify the authenticity of the extracted content identification data.

Support for the amendments to claim 22 (as well as for claim 35) can be found in the specification at least on page 3, lines 12-19; page 9, lines 15-32; page 10, lines 1-3; page 11, lines 27-32; and page 12, lines 1-11.

Claims 22, 27-30 and 35 were rejected under 35 U.S.C. §103(a) as being unpatentable over **Deguillaume** in view of **Yoshida**. With respect to claim 22, as amended herein, Applicant respectfully traverses this rejection on the grounds that these references are defective in establishing a prima facie case of obviousness.

As the PTO recognizes in MPEP § 2142:

> *... The examiner bears the initial burden of factually supporting any prima facie conclusion of obviousness. If the examiner does not produce a prima facie case, the applicant is under no obligation to submit evidence of nonobviousness...*

It is submitted that, in the present case, the examiner has not factually supported a prima facie case of obviousness for the following reasons.

5. Even When Combined, the References Do Not Teach the Claimed Subject Matter

The **Deguillaume** and **Yoshida** references cannot be applied to reject claim 22 under 35 U.S.C. § 103 which provides that:

> *A patent may not be obtained ... if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which the subject matter pertains* ... (Emphasis added)

Thus, when evaluating a claim for determining obviousness, all limitations of the claim must be evaluated. However, since neither **Deguillaume** nor **Yoshida** teaches a

method that includes "*applying* … to the hash code of combined data … *both* (c)(i) a *digital signature* of the *originator of the media data stream* and (c)(ii) a *digital signature* of a corresponding *certification authority* …" [emphasis added] as is now claimed in claim 22, it is impossible to render the subject matter of claim 22 as a whole obvious, and the explicit terms of the statute cannot be met.

Thus, for this reason, the examiner's burden of factually supporting a *prima facie* case of obviousness has clearly not been met, and the rejection under 35 U.S.C. §103 should be withdrawn.

6. The Combination of References is Improper

Assuming, arguendo, that the above argument for non-obviousness does not apply (which is clearly not the case based on the above), there is still another compelling reason why the **Deguillaume** and **Yoshida** references cannot be applied to reject claim 22 under 35 U.S.C. § 103.

§ 2142 of the MPEP also provides:

> *...the examiner must step backward in time and into the shoes worn by the hypothetical 'person of ordinary skill in the art' when the invention was unknown and just before it was made.....The examiner must put aside knowledge of the applicant's disclosure, refrain from using hindsight, and consider the subject matter claimed 'as a whole'.*

Here, neither **Deguillaume** nor **Yoshida** teaches, or even suggests, the desirability of the combination since none teaches the specific "*applying* … to the hash code of combined data … *both* (c)(i) a *digital signature* of the *originator of the media data stream* and (c)(ii) a *digital signature* of a corresponding *certification authority* …" as specified above and as claimed in claim 22.

Thus, it is clear that neither reference provides any incentive or motivation supporting the desirability of the combination. Therefore, there is simply no basis in the art for combining the references to support a 35 U.S.C. § 103 rejection.

In this context, the MPEP further provides at § 2143.01:

> *The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.*

In the above context, the courts have repeatedly held that obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching, suggestion or incentive supporting the combination. In the present case it is clear that the combination as suggested by the office action arises solely from hindsight based on the invention without any showing, suggestion, incentive or motivation in either reference for the combination as applied to claim 22. Therefore, for this reason, the examiner's burden of factually supporting a *prima facie* case of obviousness has clearly not been met, and the rejection under 35 U.S.C. §103 should be withdrawn.

Accordingly, claim 22 is allowable and an early formal notice thereof is requested. Claims 27-30 depend from and further limit allowable independent claim 22 and therefore are allowable as well. Withdrawal of the rejection is requested.

Claim 35 has been amended in a manner similar to the amendments to claim 22. Accordingly, for similar reasons as stated with respect to overcoming the rejection of claim 22, claim 35 is believed allowable and an early formal notice thereof is requested. The 35 U.S.C. §103(a) rejection thereof has now been overcome. Withdrawal of the rejection is respectfully requested.

Claim 23 was rejected under 35 U.S.C. §103(a) as being unpatentable over **Deguillaume** and **Yoshida**, as applied to claim 22, and further in view of **Miettinen**. Applicant respectfully traverses this rejection for at least the following reasons. Claim 23 depends from and further limits allowable independent claim 22 and therefore is allowable as well. Withdrawal of the rejection is requested.

Claim 24 was rejected under 35 U.S.C. §103(a) as being unpatentable over **Deguillaume**, **Yoshida**, and **Miettinen** as applied to claim 23, and in further view of **Everett**. Applicant respectfully traverses this rejection for at least the following reasons. Claim 24 depends from and further limits allowable claim 23 and therefore is allowable as well. Withdrawal of the rejection is requested.

Claim 25 was rejected under 35 U.S.C. §103(a) as being unpatentable over **Deguillaume** and **Yoshida** as applied to claim 22, and further in view of **Chang** and further in view of **Reeds**. Applicant respectfully traverses this rejection for at least the following reasons. Claim 25 depends from and further limits allowable independent claim 22 and therefore is allowable as well. Withdrawal of the rejection is requested.

Claim 26 was rejected under 35 U.S.C. §103(a) as being unpatentable over **Deguillaume** , **Yoshida**, **Chang** and **Reeds** as applied to claim 25, and further in view of **Miettinen**. Applicant respectfully traverses this rejection for at least the following reasons. Claim 26 depends from and further limits allowable claim 25 and therefore is allowable as well. Withdrawal of the rejection is requested.

Conclusion

Except as indicated herein, the claims were not amended in order to address issues of patentability and Applicants respectfully reserve all rights they may have under the Doctrine of Equivalents. Applicants furthermore reserve their right to reintroduce subject matter deleted herein at a later time during the prosecution of this application or a continuation application.

It is clear from all of the foregoing that independent claims 1, 11, 22, 31, 34 and 35 are in condition for allowance. Claims 2, 6 and 36 depend from and further limit independent claim 1 and therefore are allowable as well. Claims 12-16 and 19-21 depend from and further limit independent claim 11 and therefore are allowable as well.

Claims 23-30 depend from and further limit independent claim 22 and therefore are allowable as well. Claims 32-33 depend from and further limit independent claim 31 and therefore are allowable as well.

The amendments herein are fully supported by the original specification and drawings; therefore, no new matter is introduced. An early formal notice of allowance of claims 1-3, 6-9, 11-16 and 19-36 is requested.

Respectfully submitted,

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